

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

HC Industrial Services, LLC,	§	
	§	
<i>versus</i>	§	CIVIL ACTION NO. 4:24-cv-04744
	§	
State Automobile Mutual	§	
Insurance Company.	§	

**PLAINTIFF'S RULE 26(A)(1) REQUIRED DISCLOSURES**

TO: Defendant, State Automobile Mutual Insurance Company, by and through its attorney of record, J. Mark Kressenberg, THOMPSON, COE, COUSINS & IRONS, L.L.P., 4400 Post Oak Parkway, Suite 1000, Houston, Texas 77027.

Plaintiff, HC Industrial Services, LLC, serves its Initial Disclosures pursuant to Federal Rule 26(a)(1).

- (i) The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

**HC Industrial Services, LLC  
c/o Christian G. Alba  
The Alba Law Firm  
1410 South Gordon, Suite 200  
Alvin, Texas 77511  
(281) 990-2522 – Voice  
(281) 715-4422 – Fax**

***Plaintiff***

**State Automobile Mutual Insurance Company  
c/o J. Mark Kressenberg  
David points, III  
Thompson, Coe, Cousins & Irons, L.L.P.  
4400 Post Oak Parkway, Suite 1000  
Houston, Texas 77027  
(713) 403-8200 – Voice  
(713) 403-8299 – Fax**

***Defendant and Employees of State Automobile Mutual Insurance Company***

- (ii) A copy – or a description by category and location – of all documents electronically stored information, and tangible things that the disclosing party has in its possession, custody or control may be use to support its claims or defenses, unless the use would be solely for impeachment.

**Any and all records are electronically stored at The Alba Law Firm, 1410 S Gordon, Suite 200, Alvin, TX 77511. Plaintiff reserves the right to supplement any records of Plaintiff pursuant to Federal Rules of Civil Procedure. Plaintiff will make these records available for copying upon written request from Defendant.**

- (iii) A computation of each category of damages claimed by the disclosing party who must also make available for inspection or copying as under Rule 34 the documents or other evidentiary material, unless privilege or protected from disclosure, on which each computation is based, including material bearing the nature and extent of injuries suffered.

**Retail Market Value at the time of the loss for the 2017 Ford F-350  
Approx. \$45,000.00 + \$15,000.00 in add-ons**

**Loss of use damages will be supplemented.**

**Additional damages will be supplemented.**

**Plaintiff reserves the right to supplement this response pursuant to Federal Rules of Civil Procedure.**

- (iv) For inspection or copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**None other than Defendant.**

Respectfully Submitted,

**THE ALBA LAW FIRM**

By: /s/ *Christian G. Alba*

Christian G. Alba

State Bar No. 24080525

The Alba Law Firm

1410 S. Gordon, Suite 200

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(281) 990-2522 – Voice

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Email: alba\_law@yahoo.com

**ATTORNEY FOR PLAINTIFF**

## CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify that a true and correct copy of the foregoing instrument to which this Certificate is attached has duly been served upon each party by facsimile, U.S. First Class Mail and/or using the ECF System for filing and transmittal of a Notice of Electronic Filing pursuant to the Federal Rules of Civil Procedure on this 13<sup>th</sup> day of December, 2024.

J. Mark Kressenberg  
David points, III  
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dpoints@thompsoncoe.com

*Attorney for Defendant, State Automobile Mutual Insurance Company*

/s/ Christian G. Alba  
Christian G. Alba